



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAY 08 2015

Robin Flanagan
San Francisco VA Medical Center
4150 Clement Street
San Francisco, California 94121

Subject: Supplemental Draft Environmental Impact Statement for the San Francisco Veterans Affairs Medical Center Long Range Development Plan, San Francisco, California (CEQ # 20150066)

Dear Ms. Flanagan,

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Supplemental Draft Environmental Statement (SDEIS) evaluates the environmental effects associated with implementing the Long Range Development Plan (LRDP) for the San Francisco Veterans Affairs Medical Center at Fort Miley in San Francisco, California. It updates the Draft EIS, issued in August 2012, to reflect the revised LRDP, released in January 2014, which included refinements to individual project designs and schedules and the overall master plan.

EPA reviewed the Draft EIS and provided comments to the Veteran's Administration on October 30, 2012. We rated the DEIS as *Environmental Concerns – Insufficient Information (EC-2)*. Our comments expressed concerns regarding construction noise impacts and requested additional information regarding the alternatives selection criteria, noise, visual resources, air quality, stormwater management, and transportation and parking. We appreciate the additional information in the SDEIS that responds to our comments. The SDEIS also includes additional air quality mitigation measures, including plans to employ Tier 4 engines in construction equipment and the use of alternative fuels in accordance with the Department of Veteran Affairs Strategic Sustainability Performance Plan.

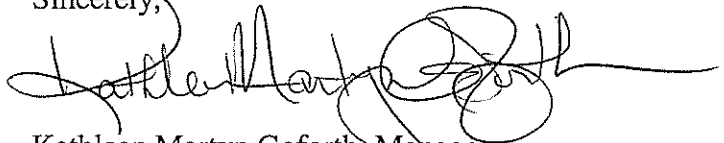
While the changes to the Proposed Action that are described in the SDEIS appear to be relatively minor, the amount of construction and demolition (C&D) waste that the VA predicts will be generated has increased by over a thousand percent. The DEIS stated that demolition would generate a maximum of 56,000 cubic feet of construction waste (p. 2-3); the SDEIS states that demolition would generate a maximum of 945,085 cubic feet of construction waste (p. 2-5). Such a substantial increase in C&D waste could reasonably be expected to result in more truck trips than was predicted in the DEIS under the lower estimate, yet it does not appear that the impact assessment has been updated to reflect this, particularly in the assessments of noise, air quality and transportation impacts.

Based on the increase in construction and demolition waste that was not evaluated, we have rated the SDEIS as *Environmental Concerns – Insufficient Information (EC-2)* (See attached “Summary of the EPA Rating System). We recommend that the Final SEIS include a more detailed discussion as to how C&D waste will be managed on- and off-site. Indicate whether and, if so, how many additional truck trips would be expected, and update the noise, air quality, and transportation impact assessments, as appropriate.

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EPA appreciates the opportunity to comment on the Supplemental Draft EIS. When the Final SEIS is released for public review, please send one hard copy and one electronic copy to the address above (specify Mail Code ENF-4-2) at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please contact me at 415-972-3521, or contact Phillip Lopez, the lead reviewer for this document, at 415-972-3210 or lopez.phillip@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Martyn Goforth', with a long horizontal flourish extending to the right.

Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of EPA Rating Definitions

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

